

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Vanessa L. Gambone,

CHAPTER 13

CASE NO. 1 - 20 .bk- 03066

Debtor(s)

NewRez LLC d/b/a Shellpoint Mortgage Servicing,

ADVERSARY NO. - ap-
(if applicable)

Plaintiff(s)/Movant(s)

vs.

Vanessa L. Gambone,
Jack N Zaharopoulos (Trustee),

Nature of Proceeding: Motion for Relief

from Automatic Stay

Defendant(s)/Respondent(s)

Document #: 29

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

The parties have engaged in settlement discussions and request a thirty (30) day continuance to work towards a resolution in lieu of a hearing.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 03/04/2022

/s/ Charles G. Wohlrab

Attorney for NewRez LLC d/b/a Shellpoint Mortgage

Name: Charles G. Wohlrab, Esq.

Phone Number: 470-321-7112 x257

¹ No alterations or interlineations of this document are permitted.